

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

WILLIAM E. UNDERLAND and MARK
SCHALLER, *on behalf of themselves and all*
others similarly situated,

Plaintiffs,

- against-

DENNIS ALTER, WILLIAM A. ROSOFF,
PHILIP M. BROWNE, DAVID B.
WEINSTOCK, ROBERT S. BLANK, MAX
BOTEL, THOMAS COSTELLO, DANA
BECKER DUNN, RONALD LUBNER, OLAF
OLAFSSON, MICHAEL STOLPER and KPMG
LLP,

Defendants.

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10-Civ.-3621 (CMR)

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**NOTICE OF MOTION AND
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiffs William E. Underland and Mark Schaller respectfully move the Court to enter an order preliminarily approving the proposed settlement of this action as documented in the Stipulation and Agreement of Settlement dated as of January 21, 2014 (the "Stipulation"). This Motion is based upon the Memorandum of Law in Support of Motion for Preliminary Approval of Class Action Settlement, the Stipulation, the Declaration of Thomas L. Laughlin IV in Support of Preliminary Approval of Class Action Settlement, the [Proposed] Order Preliminarily Approving Settlement and Confirming Final Settlement Hearing, all other papers and pleadings herein, and such oral argument as the Court may permit.

DATED: February 6, 2014

Respectfully submitted,
SCOTT+SCOTT, ATTORNEYS AT LAW, LLP

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Counsel for Lead Plaintiffs

CERTIFICATE OF SERVICE

The undersigned certifies that on February 6, 2014, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court for the Eastern District of Pennsylvania using the CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

/s/ Thomas L. Laughlin IV
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